

**PPQ Stakeholder Meeting
December 10, 2003
Breakout Session Summary**

**Import Permits and Export Certification
Service, Standardization, Security and Automation**

Panel Members:

1. Dr. Mike Firko, *Assistant Director, Plant Health Programs*
2. Ms. Parul Patel, *PPQ Senior Export Specialist*
3. Neal Rosette, *Chief Operating Officer, National Tribal Development Association*
4. Dr. Sue Tolin, *American Phytopathological Society*
5. Ms. Jeanne Porter, *Branch Manager/VP, Action International, Inc/Custom House*
6. Mr. Mike Willett, *Vice President for Scientific Affairs, Northwest Horticulture Council*
7. Bill Gimple, *National Plant Board, Maryland Department of Agriculture*
8. Juanda Rogers, *APHIS/MRP BS, Facilitator* and Claude Knighten, *APHIS/LPA, Recorder*

I. Purpose: To discuss Import-Export Certification Issues and explore areas for improvement.

II. Synopsis of Panelist's Presentations:

1) Mike Firko, Assistant Director, Plant Health Programs

Fifty percent of the Permit Unit's current initiatives are in response to the Sep. 11 attacks. Below are 12 such initiatives:

1. The Agriculture Bio-terrorism Protection Act created new responsibilities for the Permit Unit.
2. PPQ issues the following types of Permits: • Transit • Plant and Plant Products • Soil • Propagative material • Wood products • Noxious weed • CITES • Plant Pest (research, fish bait, bio-control)
3. The PPQ Permit Unit is ISO 9000 certified for Plant & Plant Products
 - This ensures the unit's average response times:
 - Overall average is 3-4 weeks
 - All but Plant Pest Permits is less than 7 days
 - Plant Pest Permits (about 5,500 issued per year) is about 43 days
4. PPQ now offers e-Permits which provides for electronic submission, State review, and issuance on-line
5. Signing of Permit Conditions is a requirement prior to permit issuance
6. Maintenance of Permit conditions will be monitored more closely
7. Entry at Plant Inspection Stations only with certain exceptions
8. Shipping Labels - tighter management and bar coding
9. Hand Carry - use bonded carriers
10. Widely prevalent pathogens: we are working with states to get pre-approval by State

11. Petition for De-regulation (Plant Protection Act)
12. One-on-one meetings to facilitate compliance/permit issuance
 - Agriculture Research Service (ARS), Ft. Dietrich • ARS, Beltsville • Animal Plant Health Inspection Service (APHIS), Beltsville • IBBA
 - Education groups/snail permits • NPDN • ANBP

2) Parul Patel, *PPQ Senior Export Specialist*

A network of over 2,000 authorized Certification Officials (ACOs), comprised of Federal, State and County (i.e., California) plant regulatory officials issue over 400,000 Federal Plant Export Certificates annually---- # 1 in the world. Certificates issued at the request of US exporters to meet foreign countries' phytosanitary requirements. PPQ is the National Plant Protection Organization responsible for administering the phytosanitary export certification program. Procedures conform to the dictates of the International Plant Protection Convention (IPPC) and Animal Plant Health Inspection Service (APHIS) regulations, policies and procedures.

Regarding automation, PPQ continues to invest in technology to increase efficiency in service delivery and security: Phytosanitary Certificate issuance and tracking (PCIT) and the EXCERPT database are integral to export certification. Next PCIT pilot is scheduled for early 2004.

3) Bill Gimpel, *National Plant Board, Maryland Department of Agriculture*

Industry is where the rubber meets the road. Maryland issues least phyto certificates, but have unsatisfied customers. Satisfy customers to keep the system working. Timeliness of our work is critical. State rights—states have expertise and interests. Federal-state partnerships are vital in protecting agriculture. Much more discussion is needed to be effective and improve our processes.

4) Sue Tolin, *American Phytopathological Society*

APHIS needs to address permit time for researchers. Standardization of permit process is a problem. Budgetary guidelines for university grants are a problem--expiration. Research Preparedness—we need the organisms. Need standardized guidance for APHIS laboratory inspectors. Different protocols, different organisms. The “no hand carried material” policy is causing difficulties for researchers—material dies or is not useful when it arrives at lab. Permit problems could affect trade relations and other things.

5) Jeanne Porter, *Branch Manager/VP, Action International, Inc/Custom House*

Changes in APHIS have made our lives tough. The federal import permit is the first and most important document to facilitate trade. Permit process hampers business. Customs brokers don't know the rules of USDA. USDA should work with customs brokers. Standardization of permits is important to us. Educate users. Keep track of permits. USDA should link up with Automated Broker Interface

6) Mike Willet, *Vice President for Scientific Affairs, Northwest Horticulture Council (NWHC)*

Washington State writes 30,000 export certificates per year. NWHC informally attends bilateral agreements. State cooperators communicate requirements through EXCERPT. APHIS-state relationship helps NWHC and is very important. State Department of Agriculture offices face the challenge of educating industry on Phytosanitary Certificates (aka “phytos”). Automation—states starting to issue phytos on hand-held computers and wireless. The NWHC industry is concerned about mixing Genetically Modified Organisms (GMOs) with natural commodities.

III. Group Discussion Points

Question: (Patrick McPherrren and Catherine Rice): Would a permit be of more value to industry stakeholders if there was a dollar value assigned? It seems part of the permit problem is caused by users who follow the guidelines. If we had to pay, would there be a guaranteed time frame we’d receive the permits?

Answer: There are fees for some permits. Jeanne doesn’t think money is an issue. It’s the regulations. We can’t guarantee a time frame because there are so many variables.
Proposed Action: e-permits

Concern: (Beril Packer): Is APHIS looking into standardizing its permits? Applicants are confused, frustrated and angered by the current permit process. The “who, what, when, where, why and how’s” should be more clearly spelled out.

Question: (Rick McColley): Who do we petition for deregulation and can an individual become a bonded carrier?

Answer: According to the Plant Protection Act, you can petition the Secretary of Agriculture.

Question: (Len Hirsch): E-permit technology would eliminate problems and educate users. What’s the timeframe for online e-permit?

Answer: We have some funding to initiate the program. Some forms should be online by September 2004.

Proposed Action: Benchmark other government agencies for improvement ideas.

Concern: (Carol Glenister – Association of Natural Biology): DHS inspectors are holding up permitted biological control materials. Researchers, businesses and other entities are at a loss because of miscommunication or bureaucracy.

Concern: (Kerry Thomas): Most of us would like to see USDA educate stakeholders and industry on permits and other issues.

Question: (Beril Packer): Could APHIS extend permit expiration dates for some material, or make regulations more consistent? The regulations create confusion and aren’t consistent.

Proposed Action: APHIS Program units: PPQ, Veterinary Services (VS), and Biotechnology Regulatory Service (BRS) should make regulations more consistent.

Question: (Beril Packer): How can we work to get permits renewed without destroying materials?

Answer: Meet the 30 day requirement and work with the APHIS Plant Health staff.

Question: (Tom O'Connor): What's the possibility of partnering with stakeholders to speed up issuing Phytosanitary Certificates?

Answer: We understand our stakeholders' need, but because of complications it's best to keep government certifying officials.

Proposed Action: We'll look closely at process improvement.

Question: (Dave Erwin): Is there flexibility in the no hand-carry policy?

Answer: Organisms aren't going to where there supposed to, but there is flexibility.

Proposed Action: Use customs -bonded carriers. With prior arrangement, turn material to PPQ official at a Plant Inspection Station and use bonded carrier there then send. Use Customs broker.

Concern: (Anita Brown): APHIS should issue a phytosanitary certificate if one was not required by either country trading.

IV. Summary Presentation to Plenary Session

- The group agreed that Process Improvement efforts can ensure:
 - Timeliness
 - Efficiency of E-permits
 - Standardization
 - Automated Certification (Phytos and permits)
 - Educate and Communicate with Stakeholders
- Recognize Different Needs
 - Commercial versus Institution
- Continue EXCERPT (Seamless)
- Hand carry organisms
- Continue/Increase Collaboration (like this meeting)
 - Work with institutional compliance groups
 - Individual versus institution
 - State/local (facility inspections and audit, more partnership and involvement)
 - Inter-agency: DHS, HHS, FAA, FDA, Interior, Fish and Wildlife
 - Intra-departmental: VS, BRS, GIPSA